

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HARRY WILLIAMSON,

Plaintiff,

v.

LORAIN COUNTY, *et al.*,

Defendants.

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Case No. 1:23-CV-1507

Judge James S. Gwin

REPORT OF PARTIES' PLANNING

MEETING UNDER FED. R. CIV.

P. 26(f) AND LR 16.3(b)(3)

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b)(3), a meeting was held on April 12, 2024 and was attended by:

Brian Bardwell counsel for Plaintiff Harry Williamson.

Michael Briach counsel for Defendants Lorain County, David Moore, Matt Lundy, Tom Williams, and James Cordes.

2. The Parties:

_____ have exchanged the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) and the Court's prior order;

 X will exchange such disclosures by May 1, 2024.

_____ have not been required to make initial disclosures.

3. The parties recommend the following track:

☐ Expedited ☒ Standard ☐ Complex
☐ Administrative ☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms: Plaintiff believes the case is suitable for mediation. Defendants believe the case is not suitable for ADR.

☐ Early Neutral Evaluation ☐ Mediation ☐ Arbitration
☐ Summary Jury Trial ☐ Summary Bench Trial
☐ Case not suitable for ADR

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Electronically Stored Information. The Parties: **(indicate one):**
☐ agree that there will be no discovery of electronically-stored information; or
☐ have agreed to a method for conducting discovery of electronically-stored information;
or
☒ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District of Ohio Local Rules).

7. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

The Parties anticipate exchanging written discovery and taking depositions on matters relevant to Plaintiff's claims and Defendants' defenses. The Parties may also seek third-party discovery through the issuance of subpoenas.

(b) Discovery cut-off date: November 29, 2024

8. Recommended dispositive motion date: January 24, 2024

9. Recommended cut-off date for amending the pleadings and/or adding additional parties: Plaintiff proposes May 1, 2024. Defendants propose April 17, 2024.

10. Recommended date for Status Hearing: Week of October 7, 2024

11. Other matters for the attention of the Court:

Based on the positions taken in state court, the parties expect that the Court will need to address some privilege issues and a protective order.

On February 20, 2024, Defendant "Lorain County" filed a Motion to Dismiss and Defendants David Moore, Matt Lundy, Tom Williams, and James Cordes filed a Motion for Partial Judgment on the Pleadings as to Counts 2, 4, 5, and 6 of Plaintiff's Complaint. (Docs. 10 and 11). Plaintiff's deadline to oppose these Motions was March 21, 2024. Plaintiff has not moved for an extension to oppose Defendants' Motions and no opposition has been filed. Accordingly, Defendants' Motions are ripe for decision.

/s/ Brian D. Bardwell (per written consent)

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